



U.S. Department
of Transportation

Pipeline and
Hazardous
Materials Safety
Administration

400 Seventh Street, S.W.
Washington, D.C. 20590

JUL 20 2005

DOT-E 13270
(SECOND REVISION)

EXPIRATION DATE: June 30, 2007

(FOR RENEWAL, SEE 49 CFR § 107.109)

1. GRANTEE: Takata Corporation
Tokyo, Japan
U.S. Agent: Thompson Hine LLP, Washington, DC
2.
 - a. PURPOSE AND LIMITATIONS: This exemption authorizes the manufacture, marking, sale and use of non-DOT specification pressure vessels for use as components of safety systems. The pressure vessels, charged with non-toxic, non-liquefied gases, are authorized for transportation in commerce subject to requirements and limitations specified herein. This exemption provides no relief from the Hazardous Materials Regulations (HMR) other than as specifically stated herein.
 - b. FIVE-YEAR TRANSPORTATION AUTHORIZATION: This exemption authorizes transportation of the pressure vessels identified herein for up to five years from the date of manufacture. This exemption provides no certification of safety for end use environments and life cycles.
 - c. EXEMPTION SCOPE LIMITATIONS: This exemption only applies to a package when it is an article of commerce in transportation. The safety analyses performed in development of this exemption only considered the hazards and risks associated with transportation in commerce. The safety analyses did not consider the hazards and risks associated with consumer use, incorporation as a component of a vehicle or other device, or other uses not associated with transportation in commerce.
3. REGULATORY SYSTEM AFFECTED: 49 CFR Parts 106, 107 and 171-180.

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4. REGULATIONS FROM WHICH EXEMPTED: 49 CFR §§ 173.301(a)(1), 173.302(a) and 175.3 in that non-DOT specification cylinders are not authorized, except as specified herein.
5. BASIS: This exemption is based on the application of Takata Corporation dated June 28, 2005, submitted in accordance with § 107.109.
6. HAZARDOUS MATERIALS (49 CFR § 172.101):

Hazardous Material Description			
Proper Shipping Name	Hazard Class/ Division	Identification Number	Packin g Group
Non-toxic, non-liquefied gases and mixtures thereof/Proper shipping name as specified in § 172.101	2.1 or 2.2 as appropriate	As appropriate	N/A

NOTE: A safety system or component which contains a quantity of pyrotechnic materials must be classed and approved as provided for in § 173.56 of the Hazardous Materials Regulations (HMR). If the pyrotechnic material augments the volume of the gas in the pressure vessel, or in any way enhances the performance of the compressed gas, the device must be tested in the same configuration as when shipped.

7. SAFETY CONTROL MEASURES:

a. PACKAGING - Packaging prescribed is a non-DOT specification pressure vessel meeting the following requirements:

(1) The maximum service pressure at 70°F may not exceed 8700 p.s.i. The minimum test pressure is the pressure of the contents at 200°F. The rated service pressure may not exceed 80 percent of the test pressure and the water volume of each pressure vessel may not exceed one liter. The term "pressure of contents" as used in this exemption means the total pressure of all the materials to be shipped in the cylinder.

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(2) Material of construction must conform to all requirements of § 178.65(b) except that aluminum is limited to alloy 6061 of T6 temper.

(3) Manufacturing requirements must conform to all requirements of § 178.65(c).

(4) The minimum wall thickness must be such that the wall stress meets the requirements of § 178.65(d).

(5) Openings and attachments must conform to all requirements of § 178.65(e) except that the diameter of the circle as referenced in § 178.65(e)(2) may not exceed 90%.

(6) Each pressure vessel must be equipped with a pressure relief device designed to meet all the requirements for a rupture disk prescribed in the Compressed Gas Association (CGA) Pamphlet S-1.1. The pressure relief device must be capable of preventing rupture of the pressure vessel when subjected to fire test conducted in accordance with CGA Pamphlet C-14.

b. TESTING -

(1) Each pressure vessel must be tested as required in § 178.65(f) except that -

(i) the hold time at test pressure specified in § 178.65(f)(1) may be limited to that which is adequate to ensure compliance with the requirements contained in § 178.65(f)(1), and

(ii) the maximum duration of the shift specified in § 178.65(f)(3) may be extended beyond 10 hours at the discretion of the independent inspector.

(2) The flattening test specified in § 178.65(g) is not required.

(3) A representative motor vehicle or aircraft safety system, packaged as it would be for shipment, must be activated and no materials other than non-toxic, non-flammable vapors or gases may be expelled from the package.

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c. MARKING - Each pressure vessel must be durably marked as follows:

DOT E-13270/8700¹

Lot No. xxxxx²

Manufacturer's Name

This Pressure Vessel May Not Be Refilled

¹ Where 8700 represents the service pressure.

² Where xxxxx is the lot number as appropriate.

Note: Each line of these markings may be placed without regard to location or order on the pressure vessel.

8. SPECIAL PROVISIONS:

a. In accordance with the provisions of Paragraph (b) of § 173.22a, persons may use the packaging authorized by this exemption for the transportation of the hazardous materials specified in paragraph 6, only in conformance with the terms of this exemption.

b. A person who is not a holder of this exemption, but receives a package covered by this exemption, may reoffer it for transportation provided no modifications or changes are made to the package and it is offered for transportation in conformance with this exemption and the HMR.

c. This exemption is limited to pressure vessels used as components of safety systems. The pressure vessels are excepted from the requirements of the HMR, Part 178 when the design has been certified by an Independent Inspection Agency, approved under 49 CFR Part 107 Subpart I as having met all the requirements of this exemption.

d. The Independent Inspection Agency's design certification must include test results and documents related to explosive classification and approval. A copy of the certification must be maintained at each facility where the safety system is manufactured and by the Independent Inspection Agency for a period of 15 years from the date of completion of the design certification.

e. A current copy of this exemption must be maintained at each facility where the package is manufactured under this exemption. It must be made available to a DOT representative upon request.

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f. Takata Corporation must comply with all provisions of this exemption, and all other applicable requirements contained in the 49 CFR, Parts 100-180. No modifications may be made to the pressure vessel, pyrotechnic components or production safety system which would affect the performance of the safety system or its compliance with the requirements of this exemption until such modifications have been reviewed, tested and certified by an Independent Inspector as meeting the requirements of this exemption.

g. Devices utilizing the non-DOT specification pressure vessel authorized herein are exempt from the requirements of 49 CFR Parts 100-180 when installed in safety components such as steering columns or door panels.

h. Pressure vessels, components, and safety systems must be transported in strong outside packaging in accordance with § 173.301(a)(9).

i. Transportation of a Division 2.1 material (flammable gases) is not authorized aboard cargo vessel or aircraft unless specifically authorized in the Hazardous Materials Table (§ 172.101).

9. MODES OF TRANSPORTATION AUTHORIZED: Motor vehicle, rail freight, cargo vessel and cargo aircraft only (see restriction in paragraph 8.i above.)

This exemption is to serve as an authorization of The Competent Authority for the United States in accordance with the General Packing Requirements under Part 3 Chapter 1 of the International Civil Aviation Organization Technical Instructions (ICAO TI) and additionally meets the requirements of State Variation US 6. Pressure vessels or safety systems in conformance with this exemption are authorized to be shipped pursuant to Packing Instruction 200 of ICAO TI.

10. MODAL REQUIREMENTS: A current copy of this exemption must be carried aboard each cargo vessel or aircraft used to transport packages covered by this exemption. The shipper shall furnish a copy of this exemption to the air carrier before or at the time the shipment is tendered.
11. COMPLIANCE: Failure by a person to comply with any of the following may result in suspension or revocation of this exemption and penalties prescribed by the Federal hazardous materials transportation law, 49 U.S.C. 5101 et seq:

- o All terms and conditions prescribed in this exemption and the Hazardous Materials Regulations, Parts 171-180.
- o Persons operating under the terms of this exemption must comply with the security plan requirement in Subpart I of Part 172 of the HMR, when applicable.
- o Registration required by § 107.601 et seq., when applicable.

Each "Hazmat employee", as defined in § 171.8, who performs a function subject to this exemption must receive training on the requirements and conditions of this exemption in addition to the training required by §§ 172.700 through 172.704.

No person may use or apply this exemption, including display of its number, when the exemption has expired or is otherwise no longer in effect.

12. REPORTING REQUIREMENTS: Shipments or operations conducted under this exemption are subject to the Hazardous Materials Incident Reporting requirements specified in 49 CFR §§ 171.15 - Immediate notice of certain hazardous materials incidents, and 171.16 - Detailed hazardous materials incident reports. In addition, the grantee(s) of this exemption must notify the Associate Administrator for Hazardous Materials Safety -- OHMEA, in writing, of any incident involving a package, shipment or operation conducted under terms of this exemption.

Issued in Washington, D.C.



fe Robert A. McGuire
Associate Administrator for
Hazardous Materials Safety

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DATE

Address all inquiries to: Associate Administrator for Hazardous Materials Safety, Pipeline and Hazardous Materials Safety Administration, Department of Transportation, Washington, D.C. 20590. Attention: PHH-31.

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Copies of this exemption may be obtained by accessing the Hazardous Materials Safety Homepage at <http://hazmat.dot.gov/exemptions> Photo reproductions and legible reductions of this exemption are permitted. Any alteration of this exemption is prohibited.

PO: CWF/AM